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ALL-STATE LEGAL SUPPLY CO. 1-800-222-0810 ED11

ATTACHMENT 1

Urgent to DAN Van Horn ①

202-857-6342

3 PAGES

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March 17, 1989

On or about June 1, 1983, we contacted Calhoun Community College by telephone and advised the broadcast department of an opening in our news department and strongly suggested minorities apply. On July 15, 1983, Carla Snell (a Black woman) was hired as reporter and morning drive news announcer. Her work was excellent and she consequently was hired away by another radio station on September 15, 1983.

During early 1982, the General Manager of WDRM began a series of discussions with Nat Tate. (a Black man) a local leader in

2

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in these meetings.

Terrell Newby left WDKT in 1987. We had several phone discussions and at least one luncheon regarding a sales job at WDRM. Mr. Newby was highly qualified and well received in the marketplace. WDRM had no openings at that time. Mr. Newby asked Mr. Bramlett of WDRM to be a reference for him during his search for employment. Mr. Bramlett most recently gave WLAC Radio of Nashville, Tennessee, a high recommendation for Mr. Newby as he was applying for a sales job.

On October 16, 1986, Al Eugene Burton answered our ad in the local paper for a sales position. We interviewed Mr. Burton but did not hire him.

In 1986, WDRM opened a sales office in the City of Huntsville, Alabama. Manpower, Inc., an employment agency and temporary service, was called upon to send potential candidates for Office Manager and Sales Assistant for interviews. Minorities were strongly suggested to apply. Five potential candidates were interviewed and WDRM hired Gwendolyn Stephenson (a Black woman) in August of 1986. Ms. Stephenson performed her duties exceptionally well and when the Huntsville office was closed in February, 1987, Ms. Stephenson was asked to come to WDRM's Decatur office with the same duties. Ms. Stephenson had children in the Huntsville Schools and she was attending college part-time. Ms. Stephenson declined the offer due to these commitments.

On or about November 3, 1986, WDRM's General Manager held discussions with Ricky Patton regarding programming its AM station. No offers were made at that time.

On or about April 13, 1987, Renita Jimmar (a Black woman) approached WDRM for a sales position. At the time of the interview there were no openings. On or about June 8, 1987, WDRM's General Sales Manager contacted Ms. Jimmar's office in an effort to offer her a position and was informed that she had just accepted a new job. Ms. Jimmar was part-time Mayor of a small municipality at the time.

In October, 1988, WDRM interviewed Carol Washington (a Black woman) for an opening as Public Affairs Director. Further discussions were held with Ms. Washington in December, 1988. Ms. Washington was offered the position of Public Affairs Director, however, due to other commitments at that time, she could not accept the offer.

On February 16, 1989, Kathy E. Jordan (a Black woman) was interviewed for the job of Public Affairs Director and Afternoon News Announcer. On February 17, 1989, Mrs. Jordan

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was offered the positin and she accepted.

In summary, Dixie Broadcasting, Inc. has sought after and employed minorities during our license period. The main interest of Dixie is to employ minorities in meaningful positions.



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ATTACHMENT 2

COUNTRY 102-FM **WDRM**

-26-

FAX TRANSFER

Company:

Arent Fox

To:

Susan Marshall

From:

Mark Brandy

Company:

COUNTRY 102-FM

WDRM

Huntsville AL

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During the year of 1982, WHOS WDRM hired 4 white males, 2 white females and 3 African Americans. All of these positions were in the upper 4 categories.

In 1983 WHOS WDRM hired 9 white males, 3 white females, 1 Black male and 1 Black female for full time positions and 2 Black males for part time positions.

In 1984 WHOS WDRM hired 5 white males, 3 white females, 1 white male part time.

In 1985 WHOS WDRM hired 4 white males, 6 white females for full time positions. One intern white male, 2 part time white males and 1 white female part time were

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MAR 23 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DBI EXHIBIT 3
Dixie Broadcasting, Inc.

Case No.	92-207	3
Subject	DIXIE	
Disposition	2/17	
Reported	2/17	
Reporter	BARBARA LORA	
Date	2/17/93	

92

D.C.

PAGES: 1 - 34

REPORTING, INC.
Reporting Depositions
C. Area (301) 261-1902
t. & Annap. (410) 974-0947

CCBY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)

APPLICATIONS OF)
DIXIE BROADCASTING, INC.)

) MM Docket #92-207

)
Decatur, Alabama)

Whereupon,

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I N D E X

<u>WITNESS:</u>	<u>EXAMINATION BY:</u>	<u>PAGE:</u>
Becky Bramlett	Direct - by Mr. Schonman	4
	Cross - by Mr. Schattenfield	32
DEPOSITION BEGAN:	3:25 p.m.	DEPOSITION ENDED: 4:30 p.m.

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P R O C E E D I N G S

(3:25 p.m.)

1
2
3 MR. SCHONMAN: We are on the record. My name is Gary
4 Schonman. I am counsel for the Mass Media Bureau, and with me
5 is my co-counsel, James Shook. And counsel for Dixie
6 Broadcasting is Thomas Schattenfield and Gerald McCartin.
7 Would you be kind enough to swear in the witness, please?

8 MR. SCHATTENFIELD: Wait a minute. Let me state the
9 other part of it. This deposition is being taken in
10 connection with the renewal proceeding in re of the
11 application of Dixie Broadcasting Inc. The file number is
12 BR-88/1201WO and BRH-88/1201WN. And Ms. Bramlett has been
13 produced for deposition here pursuant to the request of the

1 full name and address, please?

2 A I am Rebecca B. Bramlett, Decatur, Alabama.

3 Q And your street address?

4 A 2505 Walker Road, S.E.

5 Q What is your occupation?

6 A I am not employed at the time.

7 Q Do you work for Dixie Broadcasting at all?

8 A I have worked for Dixie Broadcasting, but I am not
9 employed now.

10 Q When were you most recently employed by Dixie
11 Broadcasting?

12 A I worked from, I think it was 1978, till last June,
13 June of '91.

14 Q Why did you leave Dixie Broadcasting?

15 MR. SCHATTENFIELD: Couldn't cut it?

16 THE WITNESS: No, that's not it. I have children, and
17 I was just, you know, ready to stay at home and be with my
18 children. And then there was this, I guess, you know, Mack
19 will have a new partner, and I just felt that it was better
20 that I stay at home and raise my children.

21 BY MR. SCHONMAN:

22 Q When you were working for Dixie Broadcasting, what were
23 your titles, if any?

24 A I guess you could say bookkeeper. I was Mack's
25 assistant. I have been his secretary. I have done whatever

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1 needed to be done. If it was vacuuming, I could do that. But
2 I just, I did whatever was necessary.

3 Q What were your responsibilities?

4 A Basically the bookkeeping part of it. I am not sure
5 you would call me an office manager, but I have overseen the
6 office personnel. I did payroll. I have done -- I do the
7 395's, forms. Whatever is necessary, I have done.

8 Q Specifically what have been your responsibilities
9 during the period when you were employed there pertaining to
10 Dixie's EEO program?

11 A I haven't had any direct responsibility with the EEO
12 program. I have done the 395's. That's all that I have been
13 familiar with. The annual employment reports is what I have
14 done.

15 Q Did you have any responsibility at any time for
16 establishing Dixie's EEO program?

17 A No, I did not.

18 Q Did you have any responsibility at any time for
19 executing the program, carrying it out?

20 A No.

21 Q Is it fair to say then that you were exclusively
22 involved in doing 395's and that is the extent of your
23 participation in the EEO aspect of the operations at Dixie
24 Broadcasting?

25 A To the best of my knowledge, that's right.

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1 Q Ms. Bramlett, did you have any involvement at all in
2 preparing Dixie's responses to the various Commission letters
3 of inquiry that were submitted beginning in July 1989?

4 MR. SCHATTENFIELD: What was -- you had better show
5 you.

6 BY MR. SCHONMAN:

7 Q Do you have copies of the different letters? This is
8 the first one. Ms. Bramlett, do you have before you the

1 this -- let me say this, whether it is the time to say it or
2 not. My involvement was with the 395's, the application for
3 renewal at the time when we told you how many, or put on our
4 application form how many employees that we had hired during
5 that one period, from '87, November '87 to November '88. And
6 then my next involvement was with, after the --

7 MR. SCHATTENFIELD: Petition to deny?

8 THE WITNESS: Right, after the petitioning. And that,
9 as I recall, was in March, or maybe my dates are wrong, was in
10 the early part of the year. And Mack and I did talk about all
11 of the hires for that one, for that one period, and we focused
12 only on -- or my focus was only on minorities. That is what I
13 focused on the whole ~~ty~~ focus was only on minorities. That is ~~an~~ ^{an}
14 focused on the whole time. Maybe I am, you know, not
15 responding to your question like you asked it, but -- and then
16 I didn't become involved anymore except just when Mack would
17 ask me to do something, I would do it at the time. I don't
18 remember dates, and I haven't read these things, and I don't
19 know anything about the communications between anybody, for
20 that matter. Just when Mack would ask me to do some
21 particular job, that's what I focused on and did, and then I
22 went on about my other duties.

23 BY MR. SCHONMAN:

24 Q Ms. Bramlett, would you turn to the next page, which is
25 Dixie's response to the letter of inquiry, and the response is
dated July 28, 1989? At the top right it says, "Attachment

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1 C." Do you have that before you?

2 A Okay.

3 Q This runs a number of pages. And my question to you
4 is, have you ever seen this before?

5 MR. SCHATTENFIELD: Probably again in the last few days
6 preparing for this hearing?

7 MR. SCHONMAN: Correct. Thank you.

8 MR. SCHATTENFIELD: Glad to help.

9 (Pause.)

10 THE WITNESS: I don't think I have. I don't think I,
11 other -- you know, other than just the last few days. Maybe I
12 saw it yesterday.

13 BY MR. SCHONMAN:

14 Q Would you turn to the next document, which is
15 Attachment D, as in "David," in the upper right-hand corner?
16 And it is a supplement to opposition to the petition -- it is
17 supplement to opposition to petition to deny, dated April 18,
18 1989. I'm sorry, received by the Office of the Secretary
19 April 17, 1989. Do you have that in front of you?

20 A Yes, I do.

21 MR. SCHATTENFIELD: What is the --

22 MR. SCHONMAN: Would you take a moment --

23 MR. SCHATTENFIELD: What is the date of that?

24 MR. SCHONMAN: April 17, 1989, received by the

25 Commission.

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1 MR. SCHATTENFIELD: Eighty-nine? I'm sorry.

2 THE WITNESS: April '89.

3 MR. SCHATTENFIELD: Excuse me. I'm sorry.

4 BY MR. SCHONMAN:

5 Q Would you take a few moments to look through that and
6 tell me if you have ever seen that document before, with the
7 exception of preparing for today's deposition?

8 (Pause.)

9 A I have seen this statement from that date. I have seen
10 that prior to --

11 Q I'm sorry. What is it that you have seen?

12 A Maybe this -- or am I going too far over? Is that a
13 part of that? At some point in time, I have seen that.

14 Q Is that the statement from Nat Tate?

15 A Yes.

16 Q How is it that you came to see this?

17 A I don't know. I just think I have seen this.

18 Q Have you seen any other portion of this document?

19 A Well, it's confusing to me when I have seen this, these
20 documents, but I know I saw them. I think I have seen this.
21 To the best of my knowledge, I have seen it, but I don't know
22 when I saw it.

23 Q Did you have any involvement in preparing any of these?

24 A No, I did not.

25 Q Let's move on to Attachment E, as in "Edward," if you

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1 move along. That is a letter, a two-page letter, from
2 Glenn Wolfe of the Commission directed to your husband,
3 J. Mack Bramlett. Do you have that in front of you?

4 A I do.

5 Q Have you ever seen that document?

6 MR. SCHATTENFIELD: What is the date? I don't have the
7 attachment.

8 MR. SCHONMAN: March 15, 1991.

9 MR. SCHATTENFIELD: I don't have the attachment. All I
10 have is the document. I mean, I don't have the attachment
11 designation. All I have got is the document.

12 THE WITNESS: I don't know that I have seen this before
13 now. I mean, before, you know, the last few days.

14 BY MR. SCHONMAN:

15 Q Okay. If you keep turning along, you will get to
16 Attachment F, as in "Frank," which is a letter from Arent, Fox
17 dated April 18, 1991, and it is accompanied by a number of
18 other documents. Do you have that in front of you?

19 A I do.

20 Q Would you take a moment to look through this document?

1 A As I said before, I think I have seen something here
2 with regard to Nat Tate, but I don't know that I have ever
3 read this supplemental report.

4 Q Have you ever spoken with Susan Marshall of this firm
5 about any matter?

6 A I only recall speaking to her one time. Now that was
7 in this year, I believe. I spoke to her and told her that I

1 A These first four?

2 Q Yes.

3 MR. SCHATTENFIELD: I am going to interpose an
4 objection before she answers. If she has never seen it
5 before, how can you answer questions about what is in it?

6 MR. SCHONMAN: You haven't heard the question yet.

7 MR. SCHATTENFIELD: I know, but I want to cut it off
8 before she answers it. You know, I am not going to interfere
9 unduly, but I might try.

10 THE WITNESS: Okay. I have read it.

11 BY MR. SCHONMAN:

12 Q Do you see the reference to 20 new employees between
13 1982 and February 1989?

14 A Yes, I do.

15 Q Do you have any idea where the number 20 came from?

16 A I do not.

17 Q In March or April of 1991, were you involved at any
18 time in compiling numbers for your husband as to the number of
19 new hires over the course of the license term?

20 A In March of '91?

21 Q March or April of 1991.

22 A Over the course of --

23 Q Of the license term, which would be 1982 through 1989.

24 A Not at that date, no.

25 Q At any time before April 18, 1991?

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1 A You are talking about all hires?

2 Q All hires, correct.

3 A From '82 to '88, or '87?

4 Q To '89.

5 A Eighty-nine?

6 Q From '82 through '89. And my question is, at any time
7 before April of '91, were you involved in any way in compiling
8 numbers of new hires during the license term? Do you
9 understand the question?

10 A Well, I think I do.

11 Q Well, should I rephrase it?

12 MR. SCHATTENFIELD: Let her answer it.

13 THE WITNESS: I recall we discussed hires from '87 to
14 '88. That was the license, at the time of the license
15 renewal. We talked about those, and we came up with like 16
16 or 12. I believe it was 16 at one time and then maybe 12. I
17 don't, I don't know. But I am not sure that I compiled any.
18 I don't think I compiled any numbers for the whole seven years
19 or whatever that is. I mean, you know, we are talking about a
20 long time ago, and I concentrate -- and I am the type of
21 person that concentrates on one thing at a time, and I'm
22 sorry. I can't go beyond that. One thing at a time, and then
23 I'm off on to something else. I don't --

24 BY MR. SCHONMAN:

25 Q Would you turn to Attachment G, which is the next

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